

Message

From: McKim, Krista [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AEBEEF6C80E141A29AA2BDDDD7329121-KMCKIM]
Sent: 1/6/2016 7:35:04 PM
To: Peter Swenson [Swenson.Peter@epa.gov]
CC: Sedlacek, Michael [Sedlacek.Michael@epa.gov]
Subject: FW: EPA Comment on PolyMet
Attachments: 2015 NorthMet FEIS - CSP2 Comments - Dec15.pdf; Malusis MCEA FEIS Comment Report Final 121415.pdf; myers polymet final feis review 121415.pdf

Peter,

I don't have the final letter from MCEA, but the reports attached here are the expert input that went into MCEA's comments. I haven't had a chance to look them.

From: Kathryn Hoffman [mailto:khoffman@mncenter.org]
Sent: Tuesday, December 15, 2015 9:28 AM
To: McKim, Krista <mckim.krista@epa.gov>
Cc: Sedlacek, Michael Sedlacek.Michael@epa.gov
Subject: Re: EPA Comment on PolyMet

Thank you. I saw the deadline extension, but I didn't know if it applied to EPA as well.

MCEA is taking advantage of the deadline extension, and our comments are not finalized. However, attached are 3 of our expert reports, which are finalized. The reports are from Dr. Tom Myers, a hydrologist, Dr. Mike Malusis, who specializes in liners and containment strategies, and Dr. David Chambers, geophysicist.

These reports outline many of our outstanding concerns, including:

1. Significant flaws and biases in the water modeling, including a model that is "hard-wired" to prevent water from flowing north from the mine site (consistent with the findings of John Coleman with GLIFWC), internally inconsistent horizontal conductivity that biases the model, and unrealistically low recharge that contradicts USGS work in the same region;
2. Overly optimistic predictions of the effectiveness of the slurry wall around the tailings basin, both due to potential design and construction problems as identified by Dr. Chambers and Dr. Malusis, and biased modeling assumptions, as identified by Dr. Myers;
3. Failure to predict and mitigate for what is likely significant indirect wetland impacts;
4. Misuse of the concept of "adaptive management" to avoid evaluating and mitigating potential problems, and instead just alleging that future monitoring will find problems, which can be addressed at a later date.

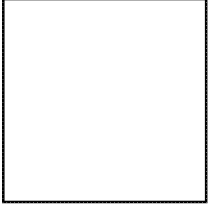
We will also have a report from Dr. Paul Glaser, who raises concerns about misidentification of wetlands selected mitigation sites. As you may know, Dr. Glaser wished to conduct some research on the proposed future PolyMet site this past summer to assist with identification of wetland types. USFS approved the his research request and stated that the work would be valuable, but PolyMet refused Dr. Glaser access on the private road into the site. This was disappointing to us, and not in the spirit of transparency of environmental review and access to public lands. I believe that USFS could have assisted us and insisted on access for Dr. Glaser, an internationally renowned wetlands scientist.

Hope you are well. Enjoy your holidays.

Best,

Kathryn Hoffman
Staff Attorney
Minnesota Center for Environmental Advocacy
26 E. Exchange St., Suite 206
St. Paul, MN 55101
(651) 287-4863 phone
(651) 223-5967 fax

khoffman@mncenter.org
www.mncenter.org



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On Tue, Dec 15, 2015 at 7:08 AM, McKim, Krista <mckim.krista@epa.gov> wrote:

Good morning Kathryn,

The deadline was extended. it was yesterday, now it's the 21st. there was a press release from DNR about it. I don't know why it was extended. Yes, EPA is planning to submit comments. Did MCEA submit comments?

-Krista

Krista McKim, P.E.

Environmental Engineer

US EPA, Region 5

312.353.8270

McKim.Krista@epa.gov

From: Kathryn Hoffman [mailto:khoffman@mncenter.org]
Sent: Monday, December 14, 2015 5:14 PM
To: McKim, Krista <mckim.krista@epa.gov>
Subject: EPA Comment on PolyMet

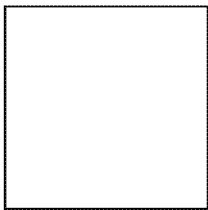
Hi Krista,

Is the EPA going to comment on PolyMet's FEIS? I think theoretically the deadline should have been today.

Best,

Kathryn Hoffman
Staff Attorney
Minnesota Center for Environmental Advocacy
26 E. Exchange St., Suite 206
St. Paul, MN 55101
(651) 287-4863 phone
(651) 223-5967 fax

khoffman@mncenter.org
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